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January 19, 2000

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Manager, Professional Programs

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DOCKET NO. 98N-0313

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VICE CHAIRMAN
Robert E. McAfee, M.D.
Portland, Maine

Dear Sir or Madam:

SECRETARY
Bernard R. Tresnowski, Esq.
Chicago, Illinois

As a nurse educator and member of the Professional Programs Department at MedicAlert® Foundation, one of the world's largest nonprofit membership organizations, I am very familiar with and concerned about the issues surrounding latex allergy. In that significant numbers of our members are victims of this debilitating disease, I reviewed the Proposed Rule to Reclassify Surgeon's and Patient Examination Gloves (64 FR 41710, July 30, 1999). While all proposed items were studied, only two held relevancy for our membership. Based upon that review, MedicAlert® Foundation offers the following comments and suggestions.

TREASURER
Dighton C. Packard, M.D., FACEP
Dallas, Texas

SECTION VI: SPECIFIC REQUESTS FOR COMMENTS

Wayne Brunetti
Denver, Colorado

1. RESPONSE TO IMPLEMENTATION TIMEFRAME

Bill Gradison, Jr., Ph.D.
Washington, D.C.

As a nonprofit organization with 4 million members worldwide, 2.7 million members in the United States, and a mission to help save lives by transmitting emergency medical information *right now*, we are aware of and concerned about a growing number of MedicAlert® Foundation members with latex allergy. A look at our current membership numbers demonstrates the exponential growth of members with this serious medical condition. For example, the number of latex allergy related requests for MedicAlert® Foundation emblems rose from 12 in 1986 to 1,650 in 1996. By January 3, 2000, the number had grown to 12,281.

H.C. Henry, Jr.
Atlanta, Georgia

Based upon this exponential growth alone, especially that seen over the last four years, the urgency of the situation dictates a quicker implementation than the currently targeted two-year date. Our numbers support the fact that even one year has the potential for serious consequences.

Ulice Payne, Jr., Esq.
Milwaukee, Wisconsin

R. Faser Triplett, M.D.
Jackson, Mississippi

PRESIDENT & CEO
Tanya J. Glazebrook

9. RECOMMENDED VERSUS REQUIRED LIMITS

Several members with latex allergy have voiced concern through the MedicAlert®

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24-hour Emergency Response Center that many first responders are not aware of the seriousness of members' conditions. For example, some first responders--or pre-hospital emergency medical staff--have approached members wearing latex gloves. These members will not call an ambulance without assuring that it is latex safe. While their efforts may increase awareness on a local level, there is a great and growing need for national mandates such as the Proposed Rule to Reclassify Surgeon's and Patient Examination Gloves.

Given the widespread implications for our members' health, and the potential grave and instantaneous reactions to latex, including anaphylaxis, we advocate that the changes be "required" rather than "recommended".

Through our famous emblems, MedicAlert® Foundation, the most widely recognized emergency medical information service, speaks for its members when they cannot speak for themselves. Because of the ubiquitous nature of latex, we advocate any action that educates and protects our members.

If you have questions about our comments or would like more information, please do not hesitate to contact me at (209) 669-4033.

Sincerely, ,

Alicia Hugg, M.A., RN
Professional Programs Manager



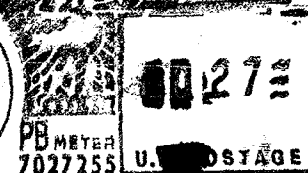
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